

Annex 3

Privacy Notice (English Version)

Privacy notice on the processing of personal data Virtual Mirror

This privacy notice, drafted pursuant to Article 13 of EU Regulation 679/2016 ("GDPR"), describes how Luxottica Group S.p.A. processes personal data of the subjects using Virtual Mirror technology.

**Who decide how and why your personal data is processed?**

The data controller of your personal data is Luxottica Group S.p.A. (hereinafter "**Luxottica**" or the "**Company**") with registered office in Piazzale Cadorna, 3, 20123, Milan - Italy.

**Has a Data Protection Officer been appointed?**

The Company has appointed a Data Protection Officer (DPO) for all Luxottica Group companies, who can be contacted at the following email address: dpo@luxottica.com.

**What personal data do we process?**

If you use Virtual Mirror technology on a device equipped with a camera, the Company will only process your image.

The Company, through Virtual Mirror technology, does not process users' biometric data (defined by Article 4 of the GDPR as "*personal data obtained by specific technical processing relating to physical, physiological or behavioral characteristics of a person that allow or confirm their unique identification, such as facial image or dactyloscopic data*").

**Why do we process your data?**

Your image will be processed using Virtual Mirror technology to allow you to try on the sunglasses or eyeglasses you prefer in real time, as if you were in front of a mirror.

**Which is the legal basis we rely on to process your data?**

The processing of your image is necessary in order to allow you to use the Virtual Mirror feature and, therefore, the legal basis is the performance of a contract to which you are a party or the performance of pre-contractual measures.

**What are the consequences of not providing your data?**

Providing your data is optional; however, if you do not give us permission to access the camera of your device to detect your image, you will not be able to try on the glasses you prefer in real time.

**How does Virtual Mirror work?**

Virtual Mirror is an augmented reality technology through which a user can virtually and in real time try on the sunglasses or eyeglasses he/she wants, as if he/she were in front of a mirror.

The user who wants to try a pair of glasses, after selecting them, is asked for permission to access the camera of the device used (e.g. smartphone, tablet, PC, totem) in order to take advantage of Virtual Mirror technology. After providing permission to access the camera, a 3-D space in the shape of a

dotted oval appears on the user's screen to help framing the face correctly. The Virtual Mirror technology then applies an algorithm for the sole purpose of identifying certain landmarks within the image. The reference points are based on the average position and shape of the corners of the eyelids, the tip of the nose, and the top of the ears that touch the arms of the glasses. Specifically, the algorithm works by measuring the shapes of the landmarks to determine the position of the user's face. Finally, the user can view the glasses worn on his/her face on the device's screen.



With whom do we share your personal data?

Your image is processed in real time with no retention by the Company.

Company personnel will not have access to your image, which will not be communicated to third parties.



Will your data be transferred outside the EU?

Your image will not be transferred outside the European Union.



How long do we keep your data?

Your image is processed in real time, without storage by the Company.

If you click on the appropriate command you will be able to take a picture and download it to your device. Even in this case, the Company will not have access to your image and it will not be stored by the Company.



What are your rights in relation to your personal data?

In relation to the processing of your personal data, you will have the right, where applicable, to ask the Company, at any time, to access the personal data concerning you, to request their rectification, erasure or restriction of their processing, to object to their processing, to revoke consent, where given, and to request their portability to third parties.



What other rights can you exercise in relation to your personal data?

You will always have the right to lodge a complaint with the competent supervisory authority.

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